

REMARKS

Reconsideration of the action mailed September 5, 2003, is requested in light of the foregoing amendments and the following remarks.

The Examiner rejected claims 1-2, 6, 8-15, 19, and 21-28 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 6,021,412 ("Ho") in view of U.S. Patent 5,982,369 ("Sciammarella").

The Examiner rejected claims 3-5 and 16-18 under 35 U.S.C. §103(a) as being unpatentable over Ho in view of Sciammarella and U.S. Patent 6,480,837 B1 ("Dutta").

The Examiner rejected claims 7 and 20 under 35 U.S.C. §103(a) as being unpatentable over Ho in view of Sciammarella and U.S. Patent 6,526, 170 ("Matsumoto").

Applicant has amended claims 1, 5-13, and 27. Applicant has canceled claims 14-26 and submits new claims 29-41 in their stead. Claims 29-41 are computer program product claims corresponding to claims 1-13 as amended. The amendments to claims 1-13 broaden claims as to limitations that are not material to patentability and provide clearer antecedent basis. No new matter is added.

I. Section 103(a) rejections

Claim 1 and 27 were rejected as unpatentable over Ho in view of Sciammarella. Applicant respectfully submits that Ho and Sciammarella, either alone or in combination, fail to disclose or suggest elements of claims 1 and 27. Both claims 1 and 27 recite "collecting one or more images associated with the document, each image having a location in the document" and "generating a proximity factor for each pair of the one or more images and the one or more document keywords, the proximity factor reflecting a degree of correlation between the image and the document keyword of the pair." Neither Ho nor Sciammarella describe or suggest collecting image having a location in the document and generating a proximity factor for a pair of an image and a document keyword.

In Ho, images are searched for in a graphics library for placement in a document. In Sciammarella, the images are generated to represent search results and then displayed on a

screen. In both cases, the images are not located in, or collected from, the document. See Ho, column 1 lines 62-67, figure 5 element 506-508, and column 6 lines 14-34; Sciammarella abstract and column 2 lines 3-25.

The Examiner acknowledges that Ho does not describe or suggest a "proximity factor" and looks to Sciammarella for that limitation. As noted above, Sciammarella does not collect images from a document but instead creates the images themselves. Moreover, in Sciammarella the images are not images of the kind that can be located or contained in a document. Rather, Sciammarella is directed to a system for displaying search results following a search request on a database. In the prior art described by Sciammarella, such search results are displayed in lists numbering the results sequentially with relevance values, while Sciammarella instead generates images for display on a screen to indicate the search results graphically. Thus, Sciammarella does not generate a proximity factor reflecting the correlation between an image located in a document and a document keyword.

Consequently, neither reference nor the combination of them teaches or suggests "determining the importance of each image in the document" as required by claim 1. Since neither Ho nor Sciammarella discloses or suggests the above feature of claims 1 and 27, the combination of Ho and Sciammarella does not disclose or suggest claims 1 or 27. For at least the foregoing reasons, Applicant respectfully submits that claims 1 and 27 as well as claims 2-13 and 28, which depend from claims 1 and 27, respectively, are in condition for allowance.

Claim 6 recites "identifying image text associated with each image of the one or more images." As discussed above, neither Ho nor Sciammarella use images having a location in a document. Therefore, neither Ho nor Sciammarella disclose or suggest identifying image text associated with images in a document. For this additional reason, claim 6 is allowable.

Claims 10 recites "lexically analyzing the image text," claim 11 recites "phonetic comparison between the image text associated with the image and the document keyword," and claim 12 recites "measuring the distance between the image in the document and the document keyword" as techniques for "generating the proximity factor for an image and a document keyword of a document keyword and image pair." Neither Ho nor Sciammarella disclose or

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suggest any of these three techniques for generating a proximity factor for an image and keyword pair collected from a document. For this additional reason, claims 10-12 are in condition for allowance

II. New Claims

Claims 29-41 have been added. For at least the reasons that apply to claims 1-13, claims 29-41 are in condition for allowance.

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

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